

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a  
SHAREHOLDER.COM ,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON  
CORPORATION, ROBERT I. ADLER, JOHN  
DOES 1 through 5 and JANE DOES 1 through 5,

Defendants.

Civil Action No. 04-10535-PBS

**ASSENTED TO MOTION TO IMPOUND SHAREHOLDER.COM'S  
MEMORANDUM IN SUPPORT OF ITS MOTION TO COMPEL DEFENDANTS  
CCBN.COM AND THE THOMSON CORPORATION TO CONDUCT  
SEARCHES OF CCBN.COM'S ELECTRONIC BACK-UP TAPES**

Pursuant to Local Rule 7.2, Plaintiff Shareholder.com moves for the impoundment of its Memorandum in Support of its Motion to Compel Defendants CCBN.com and The Thomson Corporation to Conduct Searches of CCBN.com's Electronic Back-up Tapes, which is being delivered by hand to the Court today. The memorandum discusses and attaches excerpts of defendants' Focus database that have been designated as "Highly Confidential" under the Stipulated Protective Order in this case. *See* Docket No. 37. Under that Order, Shareholder.com is required to seek impoundment of any documents filed with the Court containing "Confidential" or "Highly Confidential" information. *See id.* at ¶ 14. Shareholder accordingly moves for

impoundment. Counsel for defendants CCBN.com and the Thomson Corporation assents to this motion.

SHAREHOLDER.COM  
By its attorneys,

/s/ Melissa C. Allison

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Thane Scott (BBO #449340)  
Ruth T. Dowling (BBO #645568)  
John T. Bennett (BBO# 648464)  
Melissa C. Allison (BBO #657470)  
PALMER & DODGE LLP  
111 Huntington Avenue at Prudential Center  
Boston, MA 02199-7613  
617.239.0100

June 20, 2005

LOCAL RULE 7.1 CERTIFICATE

Counsel for Shareholder.com certifies that counsel for CCBN.com and The Thomson Corporation has assented to this motion.

/s/ Melissa C. Allison